

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MAKINA VE KIMYA ENDUSTRISI A.S.,

Plaintiff,

—against—

A.S.A.P. LOGISTICS LTD, ASAP
LOGISTICS AND DEFENSE SECURITY
SERVICES LTD., ASAP LOJISTIK VE
SAVUNMA TICARET LIMITED SIRKETI
D/B/A ASAP LOGISTICS AND DEFENSE
AND/OR ASAP LOGISTICS AND
DEFENSE GUVENLIK HIZMETLERI
SANAYI VE TICARET LIMITED SIRKETI,
TURKKEY CAPITAL KURUMSAL
FINANS COZUMLERI LIMITED SIRKETI
D/B/A TURKKEY CAPITAL KURUMSAL
FINANS COZUMLERI LIMITED SIRKETI;
DEBORAH CROSS, GÜVEN ACARER,
METIN NERKIS, TÜRKER KÜÇÜKER &
İLKER KÜÇÜKER,

Defendants.

Civil Action No. 1:22-cv-03933 (AS)

**ASAP DEFENDANTS’
NOTICE OF MOTION
TO EXCLUDE EXPERT
TESTIMONY OF PAMELA
O’NEILL**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law in Support of ASAP Defendants’ Motion to Exclude the Expert Testimony of Pamela O’Neill Under Fed. R. Evid. 702 and 703, the Declaration of Jeremy A. Berman, Esq. in Support of ASAP Defendants’ Motion to Exclude the Expert Testimony of Pamela O’Neill Under Fed. R. Evid. 702 and 703 and Exhibits 1-16 thereto, and all of the papers and proceedings heretofore had herein Defendants A.S.A.P. Logistics Ltd (“ASAP Logistics”), ASAP Logistics and Defense Security Services Ltd. (“ASAP Security”), ASAP Lojistik Ve Savunma Ticaret Limited Sirketi (“ASAP Turkey”) and Debbie Cross (“Cross”) (collectively the “ASAP Defendants”) hereby move this

Court, before the Honorable Arun Subramanian, United States District Judge, Southern District of New York, at the United States Courthouse, 500 Pearl Street, New York, New York 10007, for an order excluding the expert report of Pamela O'Neill and any expert testimony based upon such report, pursuant to Fed. R. Evid. 702 and 703, and granting such other and further relief as the Court may deem just and proper.

Dated: New York, New York
January 12, 2024

COWAN, LIEBOWITZ & LATMAN, P.C.

By: /s/ Richard S. Mandel
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